

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA)
 Appellee,)
)
 v.)
)
Ging-Hwang "Felicia" Tsoa)
 Appellant.)

No. 14-4162

**APPELLANT'S FIRST UNOPPOSED
MOTION TO EXTEND FILING DEADLINES**

Comes now, the Appellant, Felicia Tsoa, and respectfully moves this Court to extend the deadlines for filing the appendix and opening brief by 30 days, from May 27, 2014 until June 27, 2014, and a corresponding extension for the government's brief and Appellant's reply. In support hereof, the Appellant states as follows:

1. This appeal arises from a conviction after a three-day trial held in the Eastern District of Virginia. The trial court imposed a sentence of 30 months in this case. On April 22, 2014, this Court entered a Briefing Order requiring the appendix and opening brief to be filed by May 27, 2014.

2. The proceedings in this case relevant to the appeal were transcribed by multiple court reporters, and the undersigned counsel received the final set of transcripts on May 1, 2014. Appellant's counsel has been working diligently to review the trial record for appealable issues and to research those issues.

3. The Appellant is not a native English speaker and suffers from certain cognitive impairments, which make communication with her more difficult and time-consuming than the typical case.

4. Counsel for Appellant has conferred with the government regarding the extension sought, and the government has no objection to an extension of 30 days.

WHEREFORE, for all of the foregoing reasons, the Appellant respectfully moves this Court for a 30-day extension to file the appendix and opening brief, and corresponding extensions on the government's brief and the Appellant's reply.

Filed: May 14, 2014

Respectfully Submitted,

By: /s/ Eugene V. Gorokhov
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 14, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record in the case.

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